

1
2 Hon. Kymberly K. Evanson
3
4
5
6
7
8
9

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 STATE OF WASHINGTON, et al.,
11 Plaintiffs,
12 v.
13

14 UNITED STATES DEPARTMENT OF
EDUCATION, et al.,
15 Defendants.

CASE NO. C25-1228-KKE

**STIPULATED MOTION TO AMEND
INITIAL DISCLOSURES AND OTHER
CASE DEADLINES AND ORDER**

17 **JOINT STIPULATION**

18 Pursuant to the Court's Order of August 1, 2025 (Dkt. 145), the parties currently have three
19 deadlines in the month of October set to (1) conduct a Rule 26(f) conference, (2) exchange initial
20 disclosures, and (3) file a combined joint status report and discovery plan. As previously explained to
21 the Court, defense counsel is currently out of the office and will return on Monday, October 6, 2025.
22 Oral argument on Plaintiffs' Motion for Preliminary Injunction and Defendants' Motion to Dismiss is
23 scheduled for October 9, 2025. Because the parties believe AUSA Kipnis should take part in the Rule
24 26(f) conference and it would make sense for the conference to occur after the Court has issued an
25 order on the motion to dismiss, they hereby jointly STIPULATE, AGREE, and JOINTLY REQUEST
26 the Court to modify the scheduling order as set forth below.

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Federal Rule of Civil Procedure 26(f) Conference	October 3, 2025	Three weeks following the Court's Motion to Dismiss Decision
Initial Disclosures Pursuant to Rule 26(a)(1)	October 17, 2025	Five weeks following the Court's Motion to Dismiss Decision
Combined Joint Status Report and Discovery Plan as Required by Rule 26(f) and Local Civil Rule 26(f)	October 24, 2025	Six weeks following the Court's Motion to Dismiss Decision

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). For the reasons set forth above, the parties believe that there is good cause to modify the scheduling order and respectfully request that the Court grant their motion.

SO STIPULATED.

DATED this 29th day of September, 2025.

NICHOLAS W. BROWN
Attorney General of Washington

/s/ Ellen Range

 ELLEN RANGE, WSBA #51334
 JENNIFER K. CHUNG, WSBA #51583
 LUCY WOLF, WSBA #59028
 Assistant Attorneys General
 CYNTHIA ALEXANDER, WSBA #46019
 Deputy Solicitor General
 Complex Litigation Division
 Washington State Office of the Attorney
 General
 800 Fifth Avenue, Suite 2000
 Seattle, WA 98104-3188
 206-464-7744
 Ellen.Range@atg.wa.gov
 Jennifer.Chung@atg.wa.gov
 Lucy.Wolf@atg.wa.gov
 Cynthia.Alexander@atg.wa.gov

Attorneys for State of Washington

1 ROB BONTA
 2 Attorney General of California

3 /s/ Crystal Adams
 4 CRYSTAL ADAMS*
 5 Deputy Attorney General
 6 NELI PALMA*
 7 Senior Assistant Attorney General
 8 KATHLEEN BOERGERS*
 9 Supervising Deputy Attorney General
 10 KATHERINE MILTON
 11 Deputy Attorney General
 12 1300 I Street
 Sacramento, CA 95814
 916-210-7522
 13 Crystal.Adams@doj.ca.gov
 14 Neli.Palma@doj.ca.gov
 Kathleen.Boergers@doj.ca.gov
 Katherine.Milton@doj.ca.gov

15 *Attorneys for State of California*

16 WILLIAM TONG
 17 Attorney General of Connecticut

18 /s/ Andrew Ammirati
 19 ANDREW AMMIRATI*
 Assistant Attorney General
 165 Capitol Ave
 Hartford, CT 06106
 860-808-5090
 20 Andrew.Ammirati@ct.gov

21 *Attorney for State of Connecticut*

22 KWAME RAOUL
 23 Attorney General of Illinois

24 /s/ Emily Hirsch
 25 EMILY HIRSCH*
 Assistant Attorney General
 26 Office of the Illinois Attorney General
 115 S. LaSalle St
 Chicago, IL 60603
 773-835-0148
 27 Emily.Hirsch@ilag.gov

28 *Attorney for State of Illinois*

KATHLEEN JENNINGS
 Attorney General of Delaware

/s/ Ian R. Liston
 IAN R. LISTON*
 Director of Impact Litigation
 JENNIFER-KATE AARONSON*
 VANESSA L. KASSAB*
 Deputy Attorneys General
 Delaware Department of Justice
 820 N. French Street
 Wilmington, DE 19801
 302-683-8899
 Vanessa.Kassab@delaware.gov
 Jennifer.Aaronson@delaware.gov
 Ian.Liston@delaware.gov

Attorneys for State of Delaware

ANTHONY G. BROWN
 Attorney General of Maryland

/s/ Michael Drezner
 MICHAEL DREZNER*
 Senior Assistant Attorney General
 Office of the Attorney General
 200 Saint Paul Place, 20th Floor
 Baltimore, Maryland 21202
 410-576-6959
 Mdrezner@oag.state.md.us

Attorney for State of Maryland

AARON M. FREY
 Attorney General of Maine

/s/ Sarah A. Forster
 SARAH A. FORSTER*
 Assistant Attorney General
 Office of the Attorney General
 6 State House Station
 Augusta, ME 04333-0006
 207-626-8800
 Sarah.Forster@maine.gov

Attorney for State of Maine

1 PHILIP J. WEISER
 2 Attorney General of Colorado

3 */s/ Sarah H. Weiss*

4 SARAH H. WEISS*
 Senior Assistant Attorney General
 Colorado Department of Law
 Ralph L. Carr Judicial Center
 1300 Broadway, 10th Floor
 Denver, CO 80203
 720-508-6000
 Sarah.Weiss@coag.gov

5 *Attorney for State of Colorado*

6
 7 LETITIA JAMES
 Attorney General of New York

8 */s/ Rabia Muqaddam*

9 RABIA MUQADDAM*
 Special Counsel for Federal Initiatives
 MARK LADOV*
 Special Counsel
 14 28 Liberty Street
 15 New York, NY 10005
 212-416-8240
 Rabia.Muqaddam@ag.ny.gov
 Mark.Ladov@ag.ny.gov

16 *Attorneys for State of New York*

17
 18 DANA NESSEL
 Attorney General of Michigan

19 */s/ Neil Giovanatti*

20 NEIL GIOVANATTI*
 Assistant Attorney General
 Michigan Department of Attorney General
 23 525 W. Ottawa
 Lansing, MI 48909
 24 517-335-7603
 GiovanattiN@michigan.gov

25 *Attorney for People of Michigan*

26 ANDREA JOY CAMPBELL
 Attorney General of Massachusetts

27 */s/ Katherine Dirks*

28 KATHERINE DIRKS*
 Chief State Trial Counsel
 YAEL SHAVIT*
 Chief, Consumer Protection Division
 Office of the Massachusetts Attorney General
 1 Ashburton Place Boston, MA 02108
 617-963-2277
 Katherine.Dirks@mass.gov
 Yael.Shavit@mass.gov

Counsel for Commonwealth of Massachusetts

RAÚL TORREZ
 Attorney General of New Mexico

/s/ Aletheia V.P. Allen

ALETHEIA V.P. ALLEN*
 Solicitor General
 LAWRENCE M. MARCUS*
 Assistant Solicitor General
 New Mexico Department of Justice
 201 Third St. NW, Suite 300
 Albuquerque, NM 87102
 505-527-2776
 Aallen@nmdoj.gov
 Imarcus@nmdoj.gov

Attorneys for State of New Mexico

AARON FORD
 Attorney General of Nevada

/s/ Heidi Parry Stern

HEIDI PARRY STERN*
 Solicitor General
 Office of the Nevada Attorney General
 1 State of Nevada Way, Suite 100
 Las Vegas, NV 89119
 702-486-3420
 HStern@ag.nv.gov

Attorney for State of Nevada

1 DAN RAYFIELD
2 Attorney General of Oregon

3 /s/ Coby Howell
4 COBY HOWELL*
5 Senior Assistant Attorney General
6 Trial Attorney
7 Oregon Department of Justice
100 SW Market St.
Portland, OR 97201
971-673-1880
Coby.Howell@doj.oregon.gov

8 *Attorney for State of Oregon*

9 JOSHUA L. KAUL
10 Attorney General of Wisconsin

11 /s/ Frances Reynolds Colbert
12 FRANCES REYNOLDS COLBERT*
13 Assistant Attorney General
Wisconsin Department of Justice
14 Post Office Box 7857
Madison, Wisconsin 53707-7857
608-266-9226
Frances.Colbert@wisdoj.gov

15 *Attorney for State of Wisconsin*

16 *Admitted pro hac vice

18 TEAL LUTHY MILLER
19 Acting United States Attorney

20 s/ Teal Luthy Miller
21 TEAL LUTHY MILLER, WSBA No. 53224
BRIAN C. KIPNIS
22 Assistant United States Attorneys
Office of the United States Attorney
5220 United States Courthouse
700 Stewart Street
23 Seattle, Washington 98101-1271
Phone: 206 553 7970
E-mail: brian.kipnis@usdoj.gov
E-mail: teal.miller@usdoj.gov

25 Attorneys for Defendants

27 I certify that this memorandum contains
28 284 words, in compliance with the
Local Civil Rules.

ORDER

The Court GRANTS the parties' stipulated motion. Dkt. No. 177. The early case deadlines (Dkt. No. 145) are VACATED and will be reset as necessary after the Court resolves the pending motion to dismiss.

DATED this 29th day of September, 2025.

Kimberly A. Hanson

Kymberly K. Evanson
United States District Judge